

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

-----  
WAYMO LLC, )  
Plaintiff, )  
vs. ) Case No.  
UBER TECHNOLOGIES, INC.; ) 17-cv-00939-WHA  
OTTOMOTTO, LLC; OTTO TRUCKING LLC, )  
Defendants. )  
-----)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF ANGELA L. PADILLA, ESQ.

San Francisco, California

Monday, October, 2017

Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

JOB No. 2716665

PAGES 1-111

1	Q	Yeah.	10:36:19
2	A	I'm sure that they would have done some	10:36:21
3		forensic review of all the electronic information	10:36:23
4		available for forensic collection, forensic review	10:36:29
5		in conjunction with our outside lawyers.	10:36:34
6	Q	Okay. Do you have any personal knowledge	10:36:36
7		of what that entity did?	10:36:37
8	A	I don't, because that work was delegated	10:36:40
9		and handled by other -- other parts of the legal	10:36:42
10		department.	10:36:46
11	Q	Okay. Other than retaining this third	10:36:46
12		party, what else was done to -- by Uber to look for	10:37:12
13		and obtain the materials called for by paragraph 4	10:37:21
14		in the order?	10:37:25
15		MR. GONZALEZ: And I would instruct you	10:37:29
16		here -- I would -- to be careful not to disclose	10:37:30
17		privileged information.	10:37:33
18	A	Without getting into direct conversations,	10:37:38
19		et cetera, I know that we tasked a large number of	10:37:41
20		outside counsel to help, tasked in-house counsel to	10:37:47
21		help, tasked in-house security teams to help, tasked	10:37:51
22		others in the company who had engineering knowledge	10:37:58
23		and the ability to -- to search.	10:38:02
24		I'm sure we did a bunch of other things	10:38:10
25		too, but those are -- those are the items that come	10:38:13

1	to mind right now.	10:38:15
2	Q (BY MR. PERLSON) Okay.	10:38:16
3	A And speak to the individuals named here,	10:38:17
4	Anthony, Sameer, Radu.	10:38:19
5	The idea was to -- to leave no stone	10:38:24
6	unturned. The idea was scorched-earth approach.	10:38:26
7	Q But you didn't search everywhere -- Uber	10:38:34
8	didn't search everywhere within -- let me start over	10:38:37
9	again.	10:38:41
10	Uber did not search every electronic	10:38:42
11	source of data within Uber in response to the	10:38:44
12	court's March 16 order? Would you agree with that?	10:38:53
13	A I don't have a basis to agree or not	10:38:59
14	agree. I'm sure that what we searched was based on	10:39:01
15	identifying the most likely places where any of this	10:39:06
16	information would -- would be found, if it was there	10:39:13
17	at all.	10:39:16
18	Q Okay. What areas were searched	10:39:17
19	specifically?	10:39:19
20	A For that, you would have to ask others on	10:39:20
21	the team or outside counsel and the vendor that	10:39:22
22	helped us.	10:39:26
23	Q Okay. You don't -- you don't know that --	10:39:28
24	you don't have any personal knowledge of that	10:39:30
25	yourself?	10:39:32